

AO 91 (Rev. 11/11) Criminal Complaint

FILED
UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

UNITED STATES DISTRICT COURT

for the
District of New Mexico

2023 MAR -3 PM 3:57

CLERK-LAS CRUCES

United States of America
v.
Alejandro GUERCA-RODRIGUEZ

Case No.

23MJ407

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 25, 2022 in the county of Dona Ana and Elsewhere in the
District of New Mexico, the defendant(s) violated:

Code Section

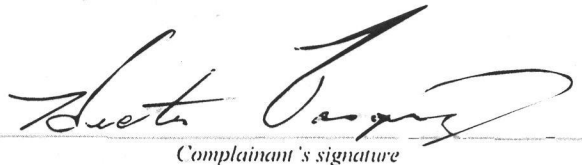
Title 18 United States Code 1956(h)

Offense Description

Title 18 United States Code 1956(h); Any person who conspires to transport, or attempts to transport, monetary instruments to wit; US currency, from a place inside the United States to a place outside the United States, knowing that he monetary instruments represented proceeds unlawful activity, to wit: conspiracy to bring in certain aliens into the United States; with the intent to promote the carrying on of said specified unlawful activity or knowing that such transportation is designed to conceal the nature of the proceeds in violation of 18:1956(a)(2)(A)&(B)(i) & (h).

This criminal complaint is based on these facts:

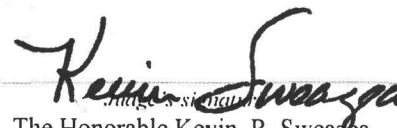
See attachment

☒ Continued on the attached sheet.

Complainant's signature

Hector J. Vasquez, HSI Special Agent

Printed name and title

Sworn to ~~before me and signed in my presence.~~ *by telephone*Date: 03-03-2023City and state: Las Cruces, New MexicoThe Honorable Kevin. R. Sweazea
United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

United States of America

vs.

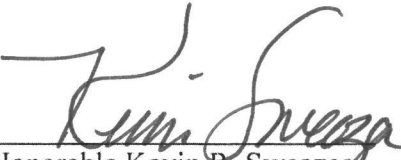
Alejandro Guereca

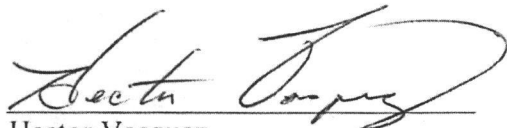
Affidavit of Hector Vasquez

On November 25, 2022, United States Customs and Border Protection Officers detained Alejandro GUERECA at the Bridge of the Americas Port of Entry in El Paso, Texas, after GUERECA failed to declare a large amount of U.S. Currency entering the United States from Mexico. Homeland Security Investigations (HSI) Special Agents responded to the scene and notified GUERECA of his rights. During a post-Miranda interview, GUERECA admitted to being a member of an Alien Smuggling Organization (ASO), and further confessed that he has transported and conspired to transport money for the ASO for the last two to three years. GUERECA stated that he transports money, which he knows to be proceeds of alien smuggling, from Mexico to the United States, and deposits the illicit proceeds into a U.S account. GUERECA also stated that unknown people deposit money into his account via electronic transfers, including Zelle, to pay for their alien smuggling fees. Alejandro GUERECA stated that he then withdraws the currency several times a month and transports that currency to other members of the ASO in Texas and New Mexico. Additionally, GUERECA stated that he smuggles aliens for the ASO and conducts purchases for ammunition, magazines, and vehicles for the ASO, which he then transports from the United States to Mexico for the ASO. For his illicit money transportation/money laundering services, GUERECA admitted that he is paid \$50-100 USD per \$1000 USD that he transports/launders for the ASO.

The United States Attorney's Office, District of New Mexico approved federal prosecution of GUERECA for 18 USC § 1956(h), Conspiracy to Commit International Money Laundering.

Subscribed and sworn to ^{by telephone} ~~before~~
~~me~~ on this 3 day of March, 2023.


Honorable Kevin R. Sweazea
United States Magistrate Judge


Hector Vasquez
Special Agent
Homeland Security Investigations